

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

MOM CA Investco LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10321 (BLS)

(Jointly Administered)

Re: Docket No. 676

**JOINDER OF MOHAMMAD HONARKAR AND 4G WIRELESS, INC. TO
DEBTORS' EMERGENCY MOTION PURSUANT TO FEDERAL RULE OF
CIVIL PROCEDURE 60(b) TO VACATE ORDER APPROVING MOTION
FOR PREFERRED BANK FOR RELIEF FROM THE AUTOMATIC STAY**

Mohammad Honarkar and 4G Wireless, Inc. (collectively, the “**Honarkar Parties**”), by and through their undersigned counsel, hereby join in the *Debtors' Emergency Motion Pursuant to Federal Rule of Civil Procedure 60(b) to Vacate Order Approving Motion for Preferred Bank for Relief from the Automatic Stay* [Docket No. 676] (the Debtors’ “**Motion to Vacate**”),² and respectfully state as follows:

JOINDER

1. The Honarkar Parties hereby join in the Debtors’ Motion to Vacate and incorporate by reference the arguments therein as if fully set forth herein.

¹ The Debtors in these chapter 11 proceedings, together with the last four digits of each Debtor’s federal tax identification number, are: MOM CA Investco LLC [6263], MOM AS Investco LLC [6049], MOM BS Investco LLC [6180], Retreat at Laguna Villas, LLC [2046], Sunset Cove Villas, LLC [9178], Duplex at Sleepy Hollow, LLC [9237], Cliff Drive Properties DE, LLC [0893], 694 NCH Apartments, LLC [0318], Heisler Laguna, LLC [4709], Laguna Festival Center, LLC [4073], 891 Laguna Canyon Road, LLC [0647], 777 AT Laguna, LLC [8715], Laguna Art District Complex, LLC [8316], Tesoro Redlands DE, LLC [2764], Aryabhata Group LLC [7332], Hotel Laguna, LLC [9580], 4110 West 3rd Street DE, LLC [8641], 314 S. Harvard DE, LLC [2057], Laguna HI, LLC [6408], Laguna HW, LLC [9470], The Masters Building, LLC [6134], 837 Park Avenue, LLC [3229], and Terra Laguna Beach, Inc. [2344] (interim). The Debtors’ headquarters are located at 520 Newport Center Drive, Suite 480, Newport Beach, CA 92660.

² Capitalized terms not defined herein shall have the meaning ascribed to them in the Debtors’ Motion to Vacate, as applicable.

2. Further, the Honarkar Parties rely on and incorporate by reference as if fully set forth herein the arguments and evidence in (i) the *Objection of Mohammad Honarkar and 4G Wireless, Inc. to the Motion of Debtors for Entry of Orders (A)(I) Approving Bidding Procedures for Tesoro Property, (II) Scheduling the Bid Deadlines, (III) Scheduling Hearings and Objection Deadlines With Respect to the Sale of Tesoro Property, (IV) Approving the Form and Manner of Notice Thereof, (V) Approving Contract Assumption and Assignment Procedures, and (VI) Granting Related Relief; and (B)(I) Approving The Sale of Tesoro Property Free And Clear of All Interests, (II) Approving Assumption and Assignment Of Executory Contracts and Unexpired Leases, And (III) Granting Related Relief* [Docket No. 368], (ii) the *363 Objection of Mohammad Honarkar and 4G Wireless, Inc. to Tesoro Sale Motion and Request to Adjourn Sale Hearing* [Docket No. 460], and (iii) the *Objection of Mohammad Honarkar and 4G Wireless, Inc. to Tesoro Sale* [Docket No. 483].

3. The Honarkar Parties respectfully request that this Court enter an order vacating the *Order Approving Motion for Preferred Bank for Relief from the Automatic Stay* [Docket No. 670] and grant such other and further relief as may be just and proper under the circumstances.

4. The Honarkar Parties hereby expressly reserve all of their rights to amend, supplement, modify, or withdraw this Joinder in whole or in part at any time. The Honarkar Parties do not waive any right they may have by filing this Joinder, including, without limitation, the right to object to and/or raise any other issue in connection with the Debtors' Motion to Vacate. The Honarkar Parties also reserve the right to further address the *Order Approving the Motion for Preferred Bank for Relief from the Automatic Stay*, the Debtors' Motion to Vacate, and any other issues raised by any other party at any hearing or through any pleading.

Dated: July 16, 2025
Wilmington, Delaware

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